IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

NATIONAL SHOOTING SPORTS FOUNDATION,

Plaintiff,

v.

No. 3:23-cv-2791-SMY

KWAME RAOUL, in his official capacity as Attorney General of Illinois,

Defendant.

DEFENDANT'S MOTION FOR LEAVE TO FILE NOTICE OF SUPPLEMENTAL AUTHORITIES

Defendant Kwame Raoul, Attorney General of the State of Illinois, pursuant to Local Rule 7.1(a)(6), respectfully requests leave to file notice of the attached supplemental authorities in support of Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction and Defendant's Motion to Dismiss. In support of this motion, Defendant states:

- 1. On October 19, 2023, Defendant filed an Opposition to Plaintiff's Motion for Preliminary Injunction. (Doc. 36.) That same day, Defendant filed a Motion to Dismiss under Rule 12(b)(1) and 12(b)(6). (Doc. 35.)
- 2. On March 7, 2024, the Seventh Circuit issued its opinion *Parents Protecting Our Children, UA v. Eau Claire Area School District*, No. 23-1534, 2024 WL 981436 (7th Cir. Mar. 7, 2024), which is relevant to pages 4–11 of Defendant's Motion to Dismiss and page 5 of Defendant's Opposition to Plaintiff's Motion for Preliminary Injunction. This opinion is attached as Exhibit 1.

3. On March 8, 2024, the United States District Court for the Eastern District of

Washington issued an order in National Shooting Sports Foundation v. Ferguson, No. 23-cv-

00113, 2024 WL 1040673 (E.D. Wash. Mar. 8, 2024), which is relevant to pages 4-11 of

Defendant's Motion to Dismiss. This order is attached as Exhibit 2.

WHEREFORE, for the above and foregoing reasons, Defendant requests that this Court

enter an order granting Defendant leave to file notice of the attached supplemental authorities

(Exhibits 1 and 2) in support of his Opposition to Plaintiff's Motion for Preliminary Injunction and

Motion to Dismiss.

Dated: March 13, 2024

Respectfully submitted,

KWAME RAOUL

Attorney General for the State of Illinois

By: /s/ Elizabeth B. Scott

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